

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GENERAL MOTORS CORP., *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

**AMERICAN EXPRESS TRAVEL RELATED SERVICE COMPANY, INC.'S
LIMITED OBJECTION TO ASSUMED CONTRACT CURE AMOUNT**

American Express Travel Related Services Company, Inc. ("AmEx") by and through its undersigned counsel files this Limited Objection to Assumed Contract Cure Amount ("Limited Objection"), and in support thereof respectfully states as follows:

1. By Order entered on June 2, 2009 [Dkt. No. 274], this Court approved certain procedures for the Debtors to assume and assign executory contracts and unexpired leases.
2. The procedures contemplated that the Debtor would establish a secure internet site, which among other things would list the proposed cure amounts for contracts to be assumed and assigned.
3. AmEx was informed that one or more contracts it has with the Debtors were to be assumed and assigned. AmEx was provided a login and password for the secure internet site.
4. According to the secure internet site as of the date of this Limited Objection, the AmEx contract described as a "Multinational Business Travel Services Agreement" was assumed on July 10, 2009. The cure information for this contract on the secure internet site,

however, remains blank.¹ AmEx has visited the site on multiple occasions and each time the cure information has been blank.

5. By order entered on July 5, 2009 [Dkt. No. 2967], this Court set August 3, 2009 as the hearing date (“Limited Contract Objection Hearing”) for limited objections to the assumption and assignment of contracts, including objections to cure amounts. Out of an abundance of caution, AmEx files this limited objection to preserve AmEx’s right to object to the Debtors’ proposed cure and to be heard, if necessary, at the Limited Contract Hearing.

WHEREFORE, AmEx respectfully requests that this Court list this Limited Objection as among those going forward at the Limited Contract Objection Hearing, to the extent the parties do not agree on the appropriate cure amount in the interim, and granting such other relief as is equitable.

FLASTER/GREENBERG P.C.

July 20, 2009

/s/ Eugene J. Chikowski
Eugene J. Chikowski, Esquire
Greg T. Kupniewski, Esquire
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103
Telephone: 215-279-9393
Facsimile: 215-279-9394
Pro Hac Vice Pending

Counsel to American Express Travel Related Services Company, Inc.

¹ AmEx contacted the Supplier Information Line (888.409.2328) on the date of this Limited Objection and was informed by an operator identifying himself as Ernesto that the Debtors were still in the process of transferring cure information to the secure internet site.